REMARKS

The Office Action dated September 8, 2005 contained a rejection of claims 1, 2, and 4-24. The Applicant has amended independent claims 1, 15 and 24. Claims 1-2, and 4-24 are in the case. Reexamination and reconsideration of the application, as amended, are requested.

The Office Action rejected claims 1, 2, and 4-24 under 35 U.S.C. § 103(a) as being unpatentable over Hattori (U.S. Patent No. 6,094,674) and Bendinelli (U.S. Patent No. 6,061,719).

The Applicant respectfully traverses this rejection based on the amendments to the claims and the arguments below.

Namely, the Applicant disagrees with the Examiner and submits that Hattori et al. in combination with Bendinelli et al. do **not** disclose all of the Applicant's previously amended claims. Specifically, **none** of cited references, in combination or alone, disclose the Applicant's central access device for **allowing an administrator** to remotely manage the plurality of devices connected to the network without requiring individual physical access of each device to browse the web content therein.

In addition, the combined references **clearly do not** disclose the Applicant's **newly amended** elements of claim 1, which includes means for announcing confederacy members by sending a message to a confederacy multicast address, wherein the devices permanently listen for other announcements on the confederacy multicast address and establish a confederacy if there are no other confederacy members, and wherein if a confederacy has already been established, all other members send unicast replies to a new device for establishing communication between the new device and existing confederacy members.

Also, the combined references do not disclose the Applicant's newly amended elements of claim 15, which includes wherein with each new established device of the confederacy, the new device queries the other devices for existing web content names and their associated Uniform Resource Locators (URLs) for establishing reciprocal monitoring relationships with the devices so that each device can monitor changes in the web content of the other devices.

Moreover, the combined references do not disclose the Applicant's newly amended

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elements of claim 24, which includes announcing confederacy members by sending a message to a confederacy multicast address, wherein the devices permanently listen for other announcements on the confederacy multicast address and establish a confederacy if there are no other confederacy members; and, if a confederacy has already been established, all other members send unicast replies to a new device for establishing communication between the new device and existing confederacy members and wherein with each established member, the new device queries the members for existing web content names and their associated Uniform Resource Locators (URLs) for establishing reciprocal monitoring relationships with the member so that each can monitor changes in the web content of the other members. These elements are **not** disclosed by the combined cited references.

Further, even though the combined references do not disclose, teach or suggest all of the Applicant's features, Hattori et al. **cannot be** combined with Bendinelli et al. because Hattori et al. teaches away from the Applicant's claimed invention. In particular, Hattori et al. **require** a user to manage their individual client machine and **not** an administrator, like the Applicant's claimed invention.

Specifically, Hattori et al. explicitly state that the purpose of the invention is "...to provide an information processing system, a method for use with the same, and a service providing method for use in the system which **allow users** not fully versed in services of the system to appropriate utilize the services of the system, thereby solving the problems above. Another object of the present invention is to provide an information processing system, a method for use with the same, and a service providing method for use in the system which **allows users** not fully versed in services of CSS to appropriately utilize the services of CSS. Further another object of the present invention is to provide an information processing system, a method for use with the same, and a service providing method for use in the system which guarantees quality of service (QSO) **supported for end users** by the system." [*emphasis added*] (see col. 2, lines 31-48 of Hattori et al.). Since Hattori et al. **require client end user interaction** and configuration in order to achieve the objectives of Hattori et al., the intended function of Hattori et al. would be destroyed if end user interaction were eliminated, like in the Applicant's claimed invention. Further, Hattori et al. would be inoperable if user interaction were eliminated because the

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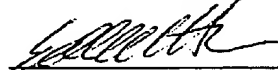purpose and objectives of Hattori et al. are all driven by end user interaction.

Thus, since Hattori et al. depend on individual end user intervention, unlike the Applicant's claimed invention, Hattori et al. cannot be used as a reference. It is well settled that when a teaching away exists, the references **should not** and **cannot** be considered together. ACS Hospital Systems, Inc. v. Montefiore Hospital, 732 F.2d 1572, 1577, 221 USPQ 929, 933 (Fed. Cir. 1984). Thus, this "teaching away" prevents obviousness from being established. In addition, the **failure** of the cited references, either alone or in combination, to disclose, suggest or provide motivation for the Applicant's claimed invention also indicates a lack of a prima facie case of obviousness. W.L. Gore & Assocs. V. Garlock, Inc., 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983). In re Gordon, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984). Accordingly, the combined cited references cannot render the Applicant's invention obvious. (MPEP 2143).

With regard to the dependent claims, since they depend from the above-argued respective independent claims, they are therefore patentable on at least the same basis. (MPEP § 2143.03).

In view of the arguments and amendments set forth above, the Applicant respectfully submits that the rejected claims are in immediate condition for allowance. The Examiner is therefore respectfully requested to withdraw the outstanding claim rejections and to pass this application to issue. Additionally, in an effort to expedite and further the prosecution of the subject application, the Applicant kindly invites the Examiner to **telephone** the Applicant's attorney at **(818) 885-1575**. Please note that all correspondence should continue to be directed to:

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Respectfully submitted,
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